



December 27, 2004

By Express Mail and E-Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

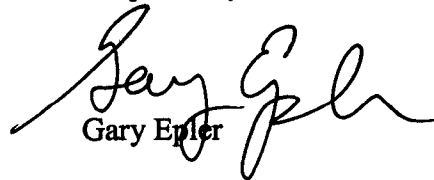
Re: Request for Exemption from the Provisions of 220 C.M.R.
101.06(14): Service Lines – Location of Valves
DTE 04-8

Dear Secretary Cottrell:

On behalf of Fitchburg Gas and Electric Light Company, d/b/a Unitil, please find "Revised" pages 2 and 3 of the January 22, 2004 letter submitted in the above-referenced docket. These revised pages should replace the corresponding pages of the original letter, which contained incorrect citations.

Thank you for your attention to this matter.

Respectfully submitted,



Gary Epler

Enclosure

cc: Julie Howley-Westwater, Hearing Officer, MDTE

Gary Epler
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- (a) single residence service lines that operate continuously throughout the year at a pressure of not less than ten pounds per square inch gage, as described in 49 C.F.R. § 192.381(a);
- (b) which have service regulators and meters outside of the building; and
- (c) which have a properly designed excess flow valve ("EFV").

FG&E submits that the safety of customers, excavators, gas company employees, and the general public is enhanced by the use of an EFV, since if a service line rupture occurs, the gas flow stops or is restricted immediately, without the necessity of waiting for an operator to be dispatched and manually close the valve. In addition, FG&E notes that the exemption from the requirement to install a curb valve where a properly designed and installed EFV exists will save the capital and maintenance costs associated with such curb valves.

The Department recognized both the safety benefit of EFVs and the savings that may be realized from a waiver from the requirement to install curb valves in its recent order granting a similar exemption to Boston Gas Company, Colonial Gas Company and Essex Gas Company d/b/a Keyspan Energy Delivery ("Keyspan") in D.T.E. 02-16-L.

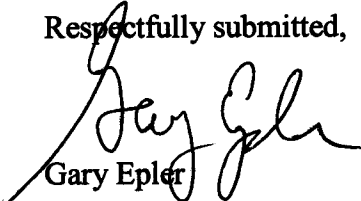
FG&E's request for an exemption is submitted subject to the same five conditions as ordered in that docket:

1. The customer meter and service regulator shall be located outside of the building.
2. The service line must have a shut-off valve located upstream of the service regulator in a readily accessible location.
3. The company shall install only those excess flow valves which meet the performance standards in 49 C.F.R. 192.381.
4. The company shall maintain a record system indicating the location, date, time and reason for each closure of an excess flow valve on any service line.
5. This exception is not applicable to any service line supplying gas to a multiple family residence, school, synagogue, church, mosque, hospital, nursing home, rehabilitation center with overnight patient facilities, theater, arena, factory or other similar buildings or any building with a service line greater or equal to two inches in diameter. (D.T.E. 02-16-L, at 5.)

Mary L. Cottrell, Secretary
January 22, 2004
Page 3 of 3 **(REVISED)**

Please note that ten copies of this request for exemption are enclosed. In addition, also enclosed are the original and ten copies of a Motion Pro Hac Vice on behalf of the undersigned counsel. Kindly date stamp one copy of the complete filing and return in the enclosed self-addressed envelop. Thank you for your attention to this matter.

Respectfully submitted,


Gary Epler

Enclosure

cc: Robert F. Smallcomb, Director, Pipeline Engineering and Safety
Division, MDTE
Andrew Kaplan, General Counsel, MDTE
Joseph Rogers, Assistant Attorney General